

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No.	5:24-CR-389 (DNH)
)		
v.)	Indictment	
)		
JUN WANG,)	Violation:	18 U.S.C. § 1956(h)
)		[Conspiracy to Launder
Defendant.)		Monetary Instruments]
)		
)	1 Count & Forfeiture Allegation	
)		
)	County of Offense:	Jefferson
)		

THE GRAND JURY CHARGES:

COUNT 1
[Conspiracy to Launder Monetary Instruments]

THE CONSPIRACY

Beginning on a date uncertain, but at least on or about June 19, 2019, and continuing through on or about June 2021, in Jefferson County in the Northern District of New York and elsewhere, the defendant,

JUN WANG,

did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, wire fraud, whereby members of the conspiracy devised and intended to devise a scheme to obtain money and property from victims in the Northern District of New York and elsewhere by fraud and for the purpose of executing the scheme to defraud caused wire

communications in interstate commerce, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OBJECT AND MANNER AND MEANS OF THE CONSPIRACY

It was the object of the conspiracy to execute a scheme to defraud individuals, financial institutions, and retail stores, including Walmart and Sam's Club (hereinafter collectively referred to as "Walmart"), to obtain money and property by acquiring, through fraudulent pretenses, representations, and promises, Walmart gift cards and converting those Walmart gift cards to other gift and pre-paid debit cards and property for use or sale by members of the conspiracy.

It was part of the manner and means of the conspiracy that members of the conspiracy would contact people by means of telephone calls, emails, and digital messaging platforms and, using false and fraudulent information, convince those individuals to purchase and then electronically send to the co-conspirators Walmart gift cards loaded with funds.

It was a part of the manner and means of the conspiracy that members of the conspiracy, would then send those fraudulently obtained gift cards numbers to **WANG** via cellular telephone. **WANG** would then convert the gift cards into other kinds of gift and pre-paid debit cards and property. **WANG** would then forward the fraudulently purchased gift and prepaid debit card numbers to other members of the conspiracy by means of cellular telephone, and **WANG** would receive compensation.

It was part of the manner and means of the conspiracy that the gift and pre-paid debit cards would, at times, be used in multiple transactions and multiple Walmart gift cards would also, at times, be used in a single purchase of gift cards and property. During the period of the conspiracy, **WANG** used fraudulently obtained gift cards sent from the state of New York and elsewhere to fund purchases of other gift cards and property at Walmart stores in Florida and elsewhere, in the total amount of more than \$2 million.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

The allegations contained in Count 1 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in Count 1 of this indictment, the defendant, **WANG**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in the offense of conviction, and any property traceable to such property, including, but not limited to, the following:

- a. a money judgment in an amount to be determined.


Substitute Assets

If any of the property described in the Forfeiture Allegation above, as a result of any act or omission of the defendant: (1) cannot be located upon the exercise of due diligence; (2) has been transferred or sold to, or deposited with, a third party; (3) has been placed beyond the jurisdiction of the court; (4) has been substantially diminished in value; or (5) has been commingled with other property which cannot be divided without difficulty, the United States of

America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: September 18, 2024

A TRUE BILL,


Grand Jury Foreperson

CARLA B. FREEDMAN
United States Attorney

By:




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